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April 4, 2023

VIA ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Rm. 1506
New York, NY 10007

Re: Tannenbaum v. Crystal Ball Media, 1:23-cv-00548 (RA)

Dear Judge Abrams:

We represent Plaintiff Allan Tannenbaum ("Plaintiff") in the above-captioned case. We write pursuant to Section 1.D of the Court's Individual Rules & Practices to respectfully request that the initial case management conference scheduled for April 7, 2023 be adjourned *sine die* in light of defendant Crystal Ball Media ("Defendant")'s failure to enter an appearance in this action. The Clerk entered a default of February 28, 2023 (Dkt. No. 12) and Plaintiff's counsel has not received any communication from Defendant, despite being properly served.

- (1) the original date of the hearing is April 7, 2023.
- (2) no previous requests for adjournment or extension have been made;
- (3) no previous requests were granted or denied;
- (4) Defendant has failed to appear and therefore neither consents to nor opposes the requested relief;

No other dates will be impacted by this request. Plaintiff intends to file his motion for default judgment within the next 30 days.

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be "Ronnie Abrams", written over a horizontal line.

Hon. Ronnie Abrams
4/5/2023

Respectfully Submitted,

s/jameshfreeman/
James H. Freeman

Counsel for Plaintiff